

Case 1:18-cr-00748-LAK Document 58 Filed 04/19/22 Page 1 of 1

MEMO ENDORSED

THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MARTIN TORRES,

Defendants.

	USDC SDNY
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EXPARTE1 MOTION FOR APPROVAL TO FILE UNDER SEAL

NOW COMES Martin Torres, by and through his attorney, Avraham C. Moskowitz, and respectfully moves, *ex parte*, for approval from the Court to file under seal a letter on behalf of defendant, requesting the use of an Associate.

WHEREFORE counsel respectfully request that the relief sought be granted.

On this 19th day of April 2022, it is

Respectfully submitted, MOSKOWITZ & BOOK, LLP

By:/s/Avraham C. Moskowitz
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Counsel to Defendant Martin White

Dated: New York, New York April 19, 2022

This application is filed *ex parte* and under seal pursuant to LCrR 12.2 because it concerns information related to defense strategy that should not be made available to the other parties to this litigation. *See* Administrative Office of the United States Courts, GUIDELINES FOR THE ADMINISTRATION OF THE CRIMINAL JUSTICE ACT, Section 640.20.